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Subject: RE: Mann v. Plus One, etc.

From: numoh@umohlaw.com

Date: Fri, Apr 04, 2008 9:57 pm

To: Deborah MartinNorcross <dmnorcross@martinnorcross.com>

I sent it the same day I sent Harold's. I'll send another copy.

Attached are plaintiff's second set of document requests to Plus One.

Uwem I. Umoh
255 Livingston Street,
4th Floor
Brooklyn, NY 11217
718.360.0527
718.360.1916 (Fax)

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Subject: [FWD: RE: Mann v. Plus One, etc.]

From: umoh@umohlaw.com

Date: Fri, May 16, 2008 5:45 pm

To: HDERSCHOWITZ@lskdnylaw.com, Deborah MartinNorcross <dmnorcross@martinnorcross.com>

Hi Deborah:

Attached is my response to your May 9, 2008 letter. Also, please check for the email I send you on April 4, 2008 that included plaintiff's second set of document requests. The email is also included at the bottom of this email, and the document requests are attached.

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Brooklyn, NY 11217
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Subject: Plaintiff's Second Request for Production of Documents

From: "Deborah MartinNorcross" <dmnorcross@martinnorcross.com>

Date: Mon, May 19, 2008 10:47 am

To: "numch@umohlaw.com" <numoh@umohlaw.com>

Dear Uwem:

We did not receive your client's Second Request for Production of Documents on April 4, or at any time prior to 5:45 pm on May 16. Although this is way past the date by which they were required to be served, we nonetheless will respond within the time proscribed by the Federal Rules. Please note all of the requested documents in our clients' possession previously have been produced to you in response to requests served by both plaintiff and the co-defendants.

Since your client is not available on the May dates we proffered, please provide at least two dates for your client's deposition during the week of June 2.

Thanks.

Deborah

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(609) 945-3912 Fax
dmnorcross@martinnorcross.com

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